

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Title V (draft permit) No. V-99-004

Rogers Group, Incorporated

Hopkinsville, Kentucky 42240

Plant I.D. #072-0700-0060

Application Log # F808

March 1, 1999

Periodic Monitoring

The rotary dryer at this source is not subject to Regulation 401 KAR 59:465 (40 CFR 60, Subpart I), only to the process weight regulation; therefore, provisions for monitoring opacity are considered sufficient for periodic monitoring requirements. The opacity will be monitored qualitatively each day and the results recorded in a log. Annual monitoring using EPA Reference Method 9 is also required.

Credible Evidence:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.